

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NEPAMUCENO GALVAN,

Plaintiff,

v.

23-cv-06724 (CS)(VR)

ROLLING LAWNS, INC., DAVID FERRARO and
EVAN FERRARO,

Defendant.

**DECLARATION OF STEVEN J. MOSER
IN FURTHER SUPPORT OF DEFENDANTS' MOTION FOR A PROTECTIVE
ORDER, TO QUASH AND TO RECOVER ATTORNEYS' FEES AND COSTS
ASSOCIATED WITH THIS MOTION**

I, Steven J. Moser, declare as follows:

1. I am the attorney of record for the Defendants Rolling Lawns, Inc., David Ferraro and Evan Ferraro.
2. I make this declaration in further support of Defendants' motion to quash six (6) non-party subpoenas addressed to the Defendants' customers and for a protective order.
3. I hereby incorporate by reference the facts stated in the accompanying Reply Memorandum of Law in Further Support of Defendants' Motion to Quash and for a Protective Order as if fully set forth herein.
4. I have annexed hereto true and accurate copies of the following documents in support of the Defendants' motion:

Exhibit No.	Date	Description
1	May 21, 2024	The Court's Confidentiality Order (ECF No. 28)
2	May 13, 2024	Defendants' Letter to Plaintiff's Counsel dated August 5, 2024
3	May 31, 2024	Defendants' Letter to Plaintiff's Counsel dated August 7, 2024

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: Huntington, New York
August 12, 2024

Steven J. Moser
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